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Comment regarding Postal Service Offering DOCKET # MC2012-26
ENHANCED SERVICES PRODUCT FOR COMPETITIVE PO BOXES

Comments from Ray Norton, Owner of Mail-Pak Your Box Store

I am the owner of a small business which is a Commercial Mail Receiving Agency (CMRA) and have some comments regarding the United States Postal Service venturing into additional services for its PO Boxes. While there is no question that those boxes are competitive with the Private Mail Boxes (PMB) my store rents, there are still distinct differences that set them apart from the PMB's at my store.

The new service of e-mail notification being offered by the USPS is a new service. The USPS has not been **notifying** its PO Box customers in the past. This service requires labor and technology to implement and maintain. These items have a cost and to say that they are included in the base cost of a P O Box, when the service is new, contradicts statements made by the USPS that it is already providing this type of service and it's bundled into the PO Box rental fee. If the service was available in the past, this may be true. However, as new service, there should be a clear difference between the past and the present.

The second new service that is now available is street addressing for private carrier delivery to the PO Box. I have a few objections to this service.

1: The USPS claims that some companies will not deliver products to a PO Box due to potential fraud. By masking the actual PO Box with a street address, the USPS will be assisting in deceiving merchants who think the goods are not being shipped to a PO Box. Additionally, the USPS will cause my business harm in the same manner that it is deceiving the merchant. Once it becomes common knowledge that USPS is using the # sign to mask a PO Box, CMRA addressing will be painted with that same brush and I will likely end up losing customers because of the required addressing standards imposed on CMRA's by the USPS.

2: Street addressing costs and logistics involved do not justify a no charge bundling of this service. By its own admission, the USPS incurs a cost moving incoming packages from a receiving area to the delivery area. If, indeed, there is a cost then there needs to be a charge to cover those costs. I cannot hand a piece of mail, addressed to the local Postmaster, to my carrier without placing a stamp on it. Logic dictates then that everything handled by a USPS employee needs some type of postage. While there has been a 25% increase in pricing for the "Competitive PO Box", nothing in the USPS filing shows a breakdown of costs to prove that the investment required to implement these specific new additional services is covered by the increase in base cost.

3: Mail forwarding will be provided at no charge for these new PO Boxes. As a CMRA, I must pay to forward mail for my customers.

4: The USPS has not provided detailed costs involved in providing the form completion, the additional time required at the retail counter, the database support or the costs involved in physically storing these street address packages for pickup and then locating and delivering them to the box holder.

In conclusion, it is my considered opinion, that e-mail notification and street addressing as a premium service does not seem to be what the public really wants. Data shows that 66,000 mailbox customers chose not to renew their mailboxes in the first 6 months of the new program. Clearly the USPS PO Box customer wants an inexpensive place to receive mail and the assurance that mail will be placed in the PO Box by a certain time. It would seem that these new services are adding costs to people and businesses who are *value oriented* purchasers rather than convenience and service customers. The convenience and service oriented customers are currently ably served by the thousands of CMRA's in operation around the country. In truth, CMRA's actually save the USPS time and therefore money by reducing the number of actual mail deliveries executed each day. In my case, I receive one mail delivery a day and that saves the USPS from putting mail in 250 separate boxes.

For all of the reasons I have outlined here, I believe that these new services are not and will not benefit the USPS and, in fact, have a chance to further damage the high standards under which the USPS currently operates.

Thank you for your consideration in this matter

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